

310386



12/4/97

Rodel Inc.
451 Bellevue Avenue
Newark, DE 19713

From: Tom Toy
Superior Barrel & Drum Co., Inc.

Dear Rob,

Enclosed are the specifications for your open head drum.

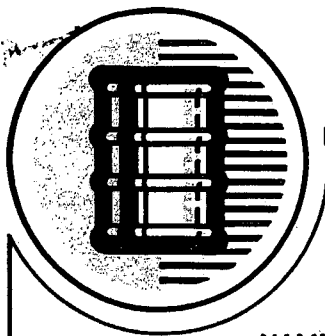
UN1A12Y1.2 250
Lined, 2 Bung Cover
1/2" High Density Gasket

All drums will be cleaned by liquid process prior to shot blasting and coating process.
Incinerating process will not be utilized for reconditioning of your containers.

Thank you for your patience and understanding in this matter. We look forward to a long association with Rodel, Inc.

Sincerely,

Tom Toy
Superior Barrel & Drum Co., Inc.



SUPERIOR BARREL AND DRUM CO. INC.
P.O. BOX 741 • GLASSBORO, NJ 08028 • (609) 881-5866

7/31/97
FM73197

NAME Fibre Mark

ADDRESS 15 mill Rd

CITY Hopewell ~~millersford~~ STATE NJ ZIP 08864-3409

DATE 7/31/97

CUSTOMER PO 53971917

QUANTITY	DESCRIPTION	PRICE	AMOUNT
77	Mfg scrap Drums for Disposal 2 5.00 each		385.00

REC'D. [Signature]

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name _____

Signature Ronald Unanue

*With regard to most regulated residues, EPA's 40 CFR 261.7 says:

"A container... is empty if:

(I) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating.

and

(II) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container..."

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container... has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

"DEALER IN STEEL DRUMS"